



# Integration

## **Code of Ethics and Business Conduct**

Integration Group

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**Integration**

Together, for the change you need



# A message from the Partners

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Throughout its existence, since 1995, the Integration<sup>1</sup> Group has built a solid reputation that inspires confidence in its professionals, clients and suppliers. We conduct business on the basis of integrity and in accordance with the laws and regulations that govern our activities in the countries we operate.

This Code of Ethics and Business Conduct (“Code of Conduct”) has specifically been designed to serve as a reference for all interested parties (“stakeholders”), including employees, partners, associates, managers and directors of the Integration Group (“professionals”) as well as clients, suppliers, business partners, authorities, association and foundation representatives and the general public. The Code of Conduct provides guidance as to the principles by which Integration conducts all of its professional relationships, in all countries in which we operate.

Additionally, Integration has established criteria that serve as essential parameters specifying who the company is and what it does. The goal of these criteria is to help our professionals understand Integration’s expectations about a number of specific topics, as well as to demonstrate the essence behind decisions.

These criteria are defined in our internal policies (“Essencis”), and they were written in order to guarantee – to the greatest extent possible – that our values are upheld when implementing Integration’s decisions anywhere in the world, thereby mitigating potential conflicts of interest as much as is feasible. The documents that comprise Essencis are complementary to this Code of Conduct and they are available for internal circulation on the Integration Intranet, to which our professionals have exclusive access.

It is up to each professional and, in particular, Integration’s leaders to ensure compliance with this Code of Conduct and with Essencis. Its precepts are to be disclosed to colleagues and teams, communication is to be encouraged regarding any conduct or behavior that is not in line with the rules described therein, and the ethical culture based on integrity that Integration cultivates is to be disseminated throughout the company.

It should be noted that this Code of Conduct is not exhaustive in that it does not cover all possible situations related to ethical issues that may arise at Integration or in the context of relationships that the company maintains with its various stakeholders. This Code of Conduct is meant to serve as a reference for making decisions in certain situations that professionals may face. For this reason, Integration revises its Code of Conduct periodically in order to ensure relevance and robustness.

In cases of doubt, professionals should seek guidance about what action to take in a given situation. “Taking the right action” is the responsibility of everyone collectively and each person individually.

Finally, Integration is always available to receive any and all suggestions, comments or questions you may have regarding the content of this Code of Conduct and the behavior expected of each of our professionals. We have left a channel open in order to hear your contributions and feedback for further enhancing Integration’s ethical professional environment.

<sup>1</sup> The Integration Group is composed of, but not limited to, the following companies: Intenta Participações Ltda., Integration Empreendimentos e Participações Ltda., Integration Consultoria Empresarial Argentina S.A.U., Integration Consultoria Empresarial Ltda., Integration Consultoria Empresarial - Chile Spa, Integration Management Consulting GmbH, Integration Consultoria de Mexico, S. de RL de CV, Integration Management Consulting Ltd. and Integration Management Consulting Inc. (“Integration”).

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# 1. To whom this Code of Conduct applies

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This Code of Conduct applies to all Integration professionals, that is, every individual who works with, works for or represents Integration in any way.

Integration expects all of its professionals to act ethically and with integrity when carrying out their work, in accordance

with the precepts laid out in this Code of Conduct. In so doing, their actions should set an example for other people and companies, allowing them to experience our ethical culture on a daily basis, as well as disseminate this culture in the business environment.



## 2. Business principles

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Integration encourages all stakeholders within its sphere of influence to adopt the principles of integrity, business ethics, internal controls, corporate governance and consideration of human rights.

For conducting its business, Integration adopted the values\* of Respect, Cooperation, Dignity, Simplicity, Justice, Honesty and Truth. These values\* serve as a foundation that are to be actively observed, and they should be used in cases of doubt regarding the Culture of Integration.

### 2.1. Legality

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In all of the countries we operate, Integration shall abide by local laws and regulations. For situations in which the law does not address a specific topic, Integration will apply its own criteria based on its Culture and Values. In the event of a conflict between a local law and Integration's criteria, the law of the respective country always take precedence.

### 2.2. Political neutrality

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Integration takes a neutral position with regard to political parties and ideologies. As such, Integration's name and resources may not be used to promote the interests of political parties or candidates nor to make donations or political contributions.

However, despite its position as a company, Integration respects each individual's right to be involved in matters of a political nature, and the company shall not interfere in these activities. All such activities are to be pursued solely and exclusively outside of Integration's work environment and without any advantage being obtained for Integration in return. Debates of a political nature are discouraged within Integration's offices and especially when on the premises of its clients.

### 2.3. Business ethics

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Integration is committed to high ethical standards when conducting its business. In this sense, the company strictly forbids any practices of corruption by its professionals, a principle that likewise applies to the relationship with all stakeholders.

Integration and its professionals are prohibited from offering, making promises, granting, lending or in any way providing – directly or indirectly, including through third parties – to its clients, potential clients, business partners, suppliers, public authorities, public officials or any representatives of such entities any rewards or advantages (financial or other) in exchange for violating laws or regulations with the objective of unduly influencing an action, obtaining an advantage or favor for the company or for others, or engaging in business with these persons or entities.

Moreover, Integration and its professionals may not accept, receive, request or demand, in any way – whether directly or indirectly, including through third parties – from clients, potential clients, business partners, suppliers, public authorities, public officials or any representatives of these entities any undue rewards or advantages.

In addition, professionals must refrain from any activities or behavior that may in any way appear or create the suspicion of conducting or attempting to conduct improper practices under the terms of the law and of this Code of Conduct.

Any form of fraud or corruption, such as blackmail, bribery, money laundering and other illegal practices, will not be tolerated in any of Integration's business relationships, be they in the public or private sector.

Integration prohibits its professionals from offering or providing improper benefits with the aim of influencing the decision of a third party – regardless of whether such a third party is a private individual, a company or a public authority –, and doing so may result in disciplinary sanctions within the scope of Integration, or even in criminal proceedings.

### 2.3.1. Donations and sponsorships

With the creation of a global agenda addressing social and environmental causes in recent years, social and environmental responsibility has gained greater relevance on the world stage. In order to create a common language, establish parameters and promote a global commitment, international organizations have set out some common principles and causes that should be pursued by governments and companies.

In order to promote positive socio-environmental developments and support causes that we believe to be relevant, Integration has made the decision to contribute to society and to environmental protection through partnerships with local institutions in the countries where it operates, in accordance with international principles of socio-environmental responsibility.

In 2015, the United Nations (UN) established a set of principles that act as a global call to action for sustainable development. These are broad themes outlining the main aspects of socially responsible conduct: respect for human rights, the promotion of decent labor practices, the reduction of adverse environmental impacts and proper corporate conduct.

Integration conducts business in line with the best global practices and we have decided to go beyond what is necessary by promoting measures related to corporate social responsibility.

To this end, we specifically support three of the **Seventeen Sustainable Development Goals**<sup>3</sup> established by the UN, which have a high degree of synergy with the nature of Integration and its businesses, namely: zero hunger (SDG 2), quality education (SDG 4), decent work and economic growth (SDG 8) and industry, innovation and infrastructure (SDG 9).



Integration promotes and accepts three types of contributions: (a) volunteering, (b) pro-bono projects and (c) donations. All partnerships or donations may only be made upon prior approval from Integration, within the scope of its corporate governance, and on the basis of thorough deliberation on the part of the responsible partners.

Additionally, Integration sponsors events and institutions within the scope of its business as a means of promoting its brand and expanding its scope of action. This includes, e.g., making financial donations to third-sector institutions, conducting mentoring sessions to assist students developing their future career plans, helping students to prepare for recruitment and selection processes and to obtain better job opportunities, participating and sponsoring events for entrepreneurs, offering coaching sessions for entrepreneurs and aspiring entrepreneurs, and more. All sponsorships are subject to prior approval from the local leadership and, if necessary, the Marketing Area, in consideration of the company's strategic agenda.

### 2.3.2. Gifts

Integration professionals are prohibited from requesting or accepting any type of personal benefit (financial or otherwise) from their business partners, such as gifts, payments, private services, loans, favors, non-business related trips etc., as such offers may affect, or have the intention of affecting, one's objectivity and critical analysis in business decisions.

<sup>3</sup> **Seventeen Sustainable Development Goals:**

**Website:** <https://sdgs.un.org/goals>, available in Portuguese, English and Spanish.

However, we understand that offering gifts and other professional courtesies may be a common practice for certain specific occasions (e.g., holidays, commemorative dates etc.). As such, Integration's professionals can only accept or offer meals of reasonable value if they are in line with local customs and practices, in addition to being able to accept and offer symbolic gifts, of no commercial value, such as pens, calendars, pen drives, cards, agendas etc., and provided that these are appropriate for the circumstances at hand. However, Integration's professionals may not accept or offer gifts, meals or entertainment if such behavior is aimed at or implies improperly influencing the respective business relationship.

Specifically, in relation to the services provided by Integration, it is common practice for the company to give and receive small gifts and materials related to the services provided after the end of a consultancy project. In these situations, this gesture is permissible as long as the aforementioned limits of reasonableness and local customs are respected, as well as all client policies (if applicable) and the guidelines laid out in the Experience Manual created by the Marketing Area (available on the Integration Intranet). The following are examples of acceptable gifts and materials for receipt and delivery: personalized boxes with pen drives, tribute plates, trophies, binders and books with project content, informational materials, table displays, folders, calendars, notebooks and the like.

Integration's **Experience Manual** is available on the Integration Intranet and can be accessed using this QR code:



### 2.3.3. Participation in events

Whenever Integration's professionals are invited by their business partners to participate or attend events, all associated costs should preferably be borne by Integration, in accordance with its internal policies.

Any exception to this rule must be approved by the leader of the area of which the professional is a member, who, in cases of doubt, must consult the Risk & Compliance Committee.

The receipt of gifts during such events must observe the provisions laid out in item 2.3.2 above.

### 2.3.4. Conflicts of interest

Conflicts of interest refer to situations in which the personal interests of a professional or a third party compete with or contradict Integration's own interests. Integration understands that our professionals must make decisions while performing activities for the company and we expect that they do so in an appropriate, correct and ethical manner, without being influenced by external factors that may, consciously or unconsciously, affect their objective judgment or promote favoritism.

If a conflict of interest, either formal or material, should arise a priori or a posteriori, or if a professional faces a situation that could potentially involve or lead to a conflict of interest, the professional must immediately communicate this to their direct superior and/or the Risk & Compliance Committee so that the situation can be resolved in a fair and transparent manner for all parties involved.

The following are potential examples of conflicts of interest:

#### 2.3.4.1. Extra-professional activities

Integration respects the individuality of all its professionals and understands that they may engage in extra-professional activities outside of Integration.

The following guidelines must be observed by professionals who wish to carry out activities in parallel to their professional obligations:

- Activities outside of Integration may not be carried out by a professional if such an activity interferes with their responsibilities, work performance, deadlines or dedication to Integration, its clients, suppliers or business partners, if it generates risks for Integration's reputation, or if such an activity has the potential to come into conflict with Integration's interests.
- Professionals may not carry out such activities during their working hours at Integration nor use the professional relationship, contacts or networking that have been created at companies, clients, suppliers or business partners to offer any type of services outside of Integration's relationship.

Every professional is not only obliged to ensure the confidentiality of information related to Integration and its clients, but also to remain impartial and professional. When Integration provides its consulting services, numerous contacts are established through the client relationship, providing Integration's professionals with access to diverse types of confidential information related to these companies. As such, professionals may not use their involvement or Integration's involvement in the business of a client, supplier or partner to offer third-party services, be they competitors of Integration or not.

■ Integration's professionals are prohibited from commercializing products or services on the company's premises or on those of its clients.

For cases in which a professional has some type of relationship (remunerated or otherwise) with another company or organization (be this as an employee, board member, director, shareholder or other party) while working for Integration, we understand that this professional may recommend Integration's services to this other company or organization. However, some precautions must be taken in order to avoid conflicts of interest: (i) we recommend that the professional inform the other company or organization of their relationship with Integration; (ii) we recommend that the company or organization consider other consulting companies for the desired services, allowing for an unbiased decision; and (iii) the professional may not be the individual responsible for approving the contracting of Integration within that company or organization.

The leadership of Integration is sometimes invited to participate on the executive boards of other companies. In such situations, the invited Integration professional must take into account their role at Integration and the role they would assume as an advisor to the other company or organization in accordance with the rules stipulated in this Code of Conduct.

Provided that there are no conflicts of interest with Integration, the professional is at liberty to decide whether or not to disclose their extra-professional activities to the company. It is, however, the professional's

duty to inform Integration of such activities in the event of conflicts of interest, by communicating this to the Risk & Compliance Committee.

#### **2.3.4.2. Competition between professionals and the company**

Professionals may not engage in any activities that are in direct competition with Integration's areas of business, directly or indirectly, nor may they seek to obtain advantages or promises of personal advantage for themselves or others from business opportunities that they become privy to during their relationship with Integration and while working with Integration's clients.

#### **2.3.4.3. Competition with clients**

Integration understands that the company may provide its services to direct competitors. We have policies and processes of competition assessment in place to ensure that the confidentiality of our clients is respected. This allows us to avoid conflicts of interest when providing services to competing companies as well as to establish clear criteria regarding the separation of consultant teams who must respectively serve different competitors and, in some cases, regarding the impossibility of offering services to a certain company. We always apply the same criteria in each situation so that an appropriate decision can be made in consideration of each specific case.

Nevertheless, in order to protect its growth and reputation as a reliable and respectable consulting company that values its clients, we should emphasize that Integration shall never compete with the activities developed by its clients.

#### **2.3.4.4. Employment of family members**

Integration allows for the spouses, partners or family members of its professionals (regardless of the degree of kinship) to be hired by the company, provided that no direct or indirect relationship of subordination arises between the professional and their spouse, partner or family member. Moreover, the professional may not participate in

the recruitment and selection process of a spouse, partner or family member. Hiring must be based solely on the candidate's professional qualifications, performance, skills and experience, following the same recruitment and selection process applied to all other candidates.

Familial or conjugal relationships arising between two Integration professionals after hiring are permissible. Such relationships must always remain as professional as possible and conflicts of interest, favoritism and impartiality in the day-to-day treatment of the other partner must always be avoided. Any complications arising from this setup will be dealt with by the Professional Development Cell. Should a familial or conjugal relationship be between employees who are in a professional relationship of superior/subordinate to one another (be it direct or indirect), this must be disclosed to the management.

#### **2.3.4.5. Holding shares in client companies**

Given the nature of the services we provide, Integration's professionals are generally in contact with confidential and sensitive material of their clients, including access to critical and restricted information. Moreover, professionals who enter into consulting projects assist clients in making decisions and defining action plans that can directly or indirectly impact the company's financial results and their performance on the financial and stock markets. For these reasons, the acquisition or sale of shares, quotas or any securities of clients or companies in which clients hold a relevant interest may imply a conflict of interest. This may even be interpreted as an infringement of the law or regulatory norms, as the professional may be using a privileged position to obtain an undue advantage on the stock market.

Integration assumes a restrictive stance on the topic. As such, professionals must inform the Risk & Compliance Committee if they hold shares, quotas or any securities in client companies when commencing professional activities at Integration or when allocated to a project at a company in which the professional holds a reasonable amount of securities at that time.

Additionally, Integration's professionals must refrain from buying or selling shares or any type of securities of Integration's clients based on privileged information obtained in the course of their professional activities at Integration. "Clients", in this context, are companies which have or have had consultancy projects with Integration that ended within the last 24 months, counted from the date of purchase of shares, quotas or any other type of securities in question. This rule is valid regardless of the country in which the services were provided, the professional's position at Integration or whether or not the professional participated in the project. We recommend that Integration's professionals seek financial advice from wealth management specialists to deal with such types of investment to avoid conflicts of interest.

Any exception to the rules established herein are subject to joint review by the Risk & Compliance Committee and the Legal Area.

#### **2.3.5. Competitor relations and respecting fair competition ("antitrust") laws**

Relations with competitors must be conducted in an ethical, respectful and professional manner. Integration believes in free competition and seeks to successfully compete in the current business environment in compliance with all applicable laws regarding the defense of free competition and commercial loyalty.

Integration and its professionals will never propose nor accept entering into any type of agreement with competitors that could harm their clients, suppliers or the economy in general through unfair business practices or any such that could deprive them of the benefits of free competition.

All professionals who are in regular contact with competitors have a responsibility to ensure that they are aware of the competition laws and confidentiality obligations applicable in their countries. In cases of doubt, the Risk & Compliance Committee should be contacted.

### 2.3.6. Relations with Public Authorities

According to its internal policies, Integration only participates in calls for bids to provide consultancy services to public bodies and companies (in any sphere of authority) of the direct or indirect administration located in countries perceived by the International Community as having a low level of corruption on the basis of the *Corruption Perception Index* published by *Transparency International*<sup>4</sup>. In addition, and regardless of the country, any and all invitations to submit a proposal for services to public agencies and companies must be sent to the Management Committee before Integration can provide a response.

All institutional actions related to public authorities, politicians and civil servants, such as offering gifts, courtesies, travel, invitations to participate in Integration's or its clients' events, requests for hearings (even when related to projects with clients) etc., must be conducted and approved by the Management Committee, observing the respective laws in force for this purpose.

### 2.3.7. Hiring third parties

As Integration may directly or indirectly be impacted or even held responsible for actions or omissions by the third parties it contracts, as well as, in some cases be subject to financial and reputational losses, all third parties hired by Integration must agree to read and abide by the provisions set out in this Code of Conduct.

For this reason, all forms of contracting must be formalized by means of a specific budget or contract which must contain details as to the scope, values, term, obligations of the parties, and anti-corruption and compliance clauses in accordance with this Code of Conduct.

Integration, as an organization, is aware of the risks involved in the contracting of third parties. For this reason, we seek to keep all work involving the use of third-party information internal, such as marketing, human resources and the like. Nevertheless, suppliers and the Integration professionals who hire them must handle information related to Integration's clients and professionals with due care.

## 2.4. Fraud prevention and protection of company assets

Professionals may not engage in any type of fraudulent or dishonest conduct, directly or indirectly, involving Integration's assets or financial/accounting reports/statements. Such conduct could lead the company to take disciplinary measures against the professional, which may even result in criminal charges.

Integration's reports and financial statements form the basis for managing the business and fulfilling the company's obligations to public authorities. Therefore, all financial and accounting information must be accurate, up to date, complete and in line with general accounting principles as well as with the rules applicable in each country.

In order to ensure the integrated control of accounting matters, Integration has centralized the accounting process for all countries in which it operates through a single reputable global business partner, which also serves to satisfy international standards validated at all its offices and to ensure compliance with local accounting rules.

### 2.4.1. Intellectual property

Professionals must pay particular attention to the appropriate and correct use of Integration's tangible and intangible assets, including the "Integration" brand. All professionals must protect the company's assets from loss, damage, misuse, theft, fraud, unauthorized access and destruction.

Particular attention must be paid to intellectual property owned by Integration and its business partners. Intellectual property covers, but is not limited to, patents, trademarks, reproduction rights, trade secrets, domain names, logos, methodologies, market data and client lists, as well as any information classified as confidential know-how.

Integration has policies and procedures in place to ensure the confidentiality of the information it receives from its business partners, especially with regard to intellectual property. As such, we

<sup>4</sup> The Corruption Index can be found at <https://www.transparency.org/en/cpi>. Integration only works with the public sector in countries with scores above 65/100. For reference purposes, in 2025, the scores of the countries in which Integration operates were as follows: Argentina – 36/100 | Brazil – 35/100 | Chile – 63/100 | Germany – 79/100 | Mexico – 27/100 | United Kingdom – 70/100 | United States – 64/100.

expect all professionals who work with Integration's intellectual property to practice the same level of care, zeal and discretion to protect its assets.

Third parties' logos, videos, images or voices, including those of their professionals, may only be used upon authorization from the person in question, under the terms established by Integration's internal policies. Likewise, an equivalent level of diligence is expected when handling Integration's intellectual property. Any request for authorization to use such property must be sent to the Legal Area, which will review the request internally with Marketing and the Risk & Compliance Committee.

#### **2.4.2. Internet, email and social media**

Integration provides its professionals with the necessary internet resources, email software and electronic equipment, which are only to be used for work purposes. Professionals are prohibited from using electronic systems, internet resources, email systems or any other tools issued by Integration to transmit, receive or download content of a private or non-work-related nature that may undermine professional activities or that are illegal.

Computers, servers and any other devices or tools made available by Integration, including email messages sent and received via a corporate email account, are the property of Integration and are not considered private content, unless otherwise determined by local laws. Accordingly, Integration reserves the right to monitor, audit and investigate threats or vulnerabilities to its cybersecurity, without the need to provide prior notice. All of Integration's professionals are required to use the company's resources and assets in accordance with the security policies regulating internal information.

Social media, at work or in any other environment, should not be used to expose private or confidential information pertaining to Integration or its stakeholders.

### **2.5. Human and labor rights**

Integration supports and respects the Universal Declaration of Human Rights issued by the United Nations and is opposed to any infringement thereupon. Likewise, Integration seeks to apply these precepts to its work environment.



### 2.5.1. The work environment

Integration fosters a culture that seeks to ensure a safe, healthy work environment and that promotes professional improvement, provides equal opportunities for all, respects each individual as they are, values their **individuality** and recognizes that each professional is unique. As a result, Integration's **"Purpose"** is to guarantee an environment, rituals and tools that promote individual advancement as a professional. This purpose is expressed in the day-to-day work life at Integration, with practical actions taken within the company aimed at ensuring that all professionals experience this in a positive manner.

One of the most important tools for guaranteeing the maintenance of Integration's work environment and culture is called **"ListenInt"**. This is a confidential channel open exclusively to its professionals who want to clarify questions, register complaints and provide suggestions. Integration welcomes and encourages contributions from the point of view of each of its professionals. ListenInt constitutes a direct communication channel between the professional and the organization. This channel is managed by the Professional Development Cell, an internal structure that is part of Integration's governance and that is responsible for receiving all messages from Integration professionals via email. The Professional Development Cell is charged with directing such communications to the person, department or body responsible for processing and responding to requests in the most appropriate manner and based on the topic in question.

In addition, Integration publishes an internal newsletter called **"Weekly"**, the company's main collaborative communication tool that seeks to provide quality content and keep all professionals up to date with company affairs as well to keep Integration's culture alive. **"Weekly"** is published in the format of an electronic magazine every Wednesday.

For the external public, there is a **"Contact Us"** page available on the Integration website (<https://integrationconsulting.com/en/contact-us/>), which may be used for the same purposes as the channel mentioned above.

If any of Integration's stakeholders wish to file a complaint about misconduct, the organization provides its **IntegrityLine**<sup>5</sup>, further detailed in item 4.1 "Report Violations", below.

### 2.5.2. Non-discrimination and diversity

Integration hires, remunerates and treats all of its professionals in an equal and non-discriminatory manner with respect to gender, religion, age, special needs, sexual orientation, nationality, political opinion and ethnic or social origin. Diversity in the workplace is respected, valued and encouraged at all levels. Integration does not tolerate any type of discrimination on the part of its professionals.

With this in mind, all decisions relating to Integration's professionals must be made strictly on the basis of their professional qualifications, such as professional experience, educational background, knowledge, performance, business skills, managerial capacity etc.

### 2.5.3. Prohibition of child labor, slave labor or slavery-like practices

No form of forced or child labor is tolerated by Integration and the minimum age for hiring professionals is determined by the local laws, except for cases in which local laws allow for an age lower than that provided by the International Labor Organization (ILO) conventions regulating the minimum age of work and economic activity.

#### <sup>5</sup> **IntegrityLine:**

**Website:** [integrityline.integrationconsulting.com](https://integrityline.integrationconsulting.com), available in Portuguese, English and Spanish.

**Email:** [integrityline@ethicschannel.com](mailto:integrityline@ethicschannel.com), available in Portuguese, English and Spanish.

### **2.5.4. Prevention of moral and sexual harassment**

In the work environment, Integration ensures the personal dignity, privacy and rights of all its professionals, and we are committed to maintaining a work environment free from any type of harassment. Any such conduct, be it moral or sexual in nature, is expressly prohibited. If any misconduct is identified, the IntegrityLine is available for reporting and investigating such incidents, with the aim of maintaining and guaranteeing the well-being of all professionals in the work environment.

### **2.5.5. Freedom of association**

Integration respects the right of professionals to unite and conduct collective bargaining through associative organizations and unions, under the terms of the applicable laws. Workers' representatives will be protected from any kind of discrimination or retaliation.

### **2.5.6. Personal safety and health**

Integration takes a keen interest in the physical work environment and the well-being of its professionals. We seek to ensure the regular maintenance, care, hygiene, cleanliness and ergonomic optimization of our offices, in accordance with all laws and regulations regarding workplace safety and hygiene.

In addition, all Integration professionals are obliged to respect the safety and security standards on our clients' premises when exercising their functions and whenever otherwise applicable.

Integration believes that a healthy environment is the result of everyone's collective efforts. The company is therefore committed to guarantee to all professionals a safe and comfortable environment so that they can speak openly about occupational health issues, such as depression, burnout and anxiety (while also ensuring secrecy) to promote the well-being of all professionals.

In addition to its governance role, the Professional Development Cell also monitors and seeks to improve the work environment and ensure individual professional development, especially in order to identify any cases that require support, intervention or referral. Through ListenInt, the Professional Development Cell maintains an open dialogue that encourages our professionals to talk about issues related to safety and health.

## **2.6. Sustainability and respect for the environment**

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Integration strictly adheres to all environmental laws and regulations applicable to its activities. Moreover, we value and seek to promote conscious and sustainable attitudes towards the environment, based on the understanding that even minor actions can make a difference, such as avoiding printing documents if not absolutely necessary.

Integration is concerned with sustainability and has a Competence Center exclusively dedicated to this topic, which promotes awareness and the implementation of sustainable practices in the work environment both inside and outside of the company. Understanding that conserving the planet's limited resources and the well-being of future generations are everyone's responsibility, Integration seeks to deliver value to its customers through projects and products aimed at sustainability.

## **2.7. Responsible use of artificial intelligence**

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Integration is committed to using Artificial Intelligence ("AI") technologies in an ethical, responsible manner and in compliance with the applicable laws and regulations in the countries in which it operates. The use of AI will always be guided by market best practices, ensuring transparency, human oversight, security, respect for fundamental rights, and the protection of personal data.

Integration exclusively uses AI tools that have been previously authorized by its internal information technology team, which conducts thorough assessments regarding security, reliability, and legal compliance. In addition, Integration continuously reviews its processes to ensure that AI is employed strictly as a support tool, never replacing professional judgment, and that its outputs are reliable and explainable.

Integration also promotes regular training for its professionals on the responsible and ethical use of AI, aiming to ensure alignment with internal policies, updates in line with market practices, and compliance with applicable standards.

### 3. Confidentiality and the protection of personal data

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No professional is authorized to externally disclose – during or after the end of their relationship with Integration – sensitive information pertaining to Integration and/or its business partners (“Confidential Information”) to which they had access during their relationship with Integration, unless Integration has provided proper authorization for this. “Confidential Information” refers to all information related to the business and operations disclosed or otherwise made available to the professional, including, but not limited to: economic, commercial, legal and contractual data, methodologies (registered or not), know-how, client and supplier information, financial and accounting statements, employee and director data, management data, strategic planning, adopted policies, technical information, as well as all copies and other derived documents containing such Confidential Information.

Furthermore, the data of Integration and its professionals are also to be treated with due confidentiality. Any and all personal data received in the scope of business operations, which must be collected and processed in strict compliance with the applicable personal data protection laws, is considered “Confidential Information”. The concerned individual of such data is guaranteed all the rights provided for by law, such as, but not limited to, access, rectification, erasure, objection etc.

Integration expects business partners who have access to Integration's Confidential Information, including the personal data of its professionals, to collect and process such data in compliance with the same precepts of protection and confidentiality.



### **3.1. The use of Confidential Information**

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Confidential Information obtained by Integration must be used by Integration and its professionals exclusively for the execution of the business purpose in question. Professionals may not use or allow third parties to use such Confidential Information for any purpose other than that for which it was disclosed.

### **3.2. Information security**

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As Integration works with different clients across different industry segments and in different countries, we take confidentiality very seriously. Clients entrust Integration with their information, meaning that all professionals are responsible for ensuring maximum transparency and integrity with respect to Integration's credibility. It behooves each professional to guarantee and preserve the confidentiality and the integrity of such information, as this reflects Integration's image and reputation on the market.

Integration works with numerous business partners and suppliers across all its offices and countries who share information that they own and have an interest in protecting. These must be treated with the highest level of security and integrity by whomever is in possession of such data.

In order to maintain this trust, these companies expect Integration to protect their information on the basis of the appropriate measures, including well-founded information security policies (which Integration has designed and implemented following the best market practices) and taking simple actions on a daily basis such as: using Integration pen drives with the encryption function enabled, deleting documents after use, ensuring the confidentiality of printed material, refraining from sharing passwords with third parties, always locking computers in case of temporary absences etc.

Integration's IT Area also employs security solutions that use the latest technology for safeguarding against incidents related to data privacy. These solutions include autonomous systems that guarantee the security of all data through the use of artificial intelligence and machine learning resources that

identify external and internal threats. Integration also adopts the concepts of "zero-trust" and "admin-proof", requiring that our system administrators are audited by independent companies and that several layers of security are in place to ensure system redundancy in the case of incorrect operation or use.

### **3.3. Disclosure of Confidential Information to third parties**

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Any requests for access to information, which is classified as confidential and owned by Integration, made by third parties and not linked to the initial purpose for which consent was provided by the concerned individual must be previously approved by the Risk & Compliance Committee (when dealing with the personal data of current or former professionals) at Integration. The availability of such information will be subject to the approval of the concerned individual under the terms of the applicable data protection legislation in the country from which the demand originated, unless otherwise permitted by the applicable local laws.

Information not considered confidential includes that which: (i) was already known to the receiving party before any disclosure by the disclosing party; (ii) was publicly available before any disclosure by the disclosing party or subsequently became public information without the receiving party having contributed to such a disclosure; (iii) was received by the receiving party from a third party legally in possession of such information, and not as a result of a breach of any agreement or any confidentiality relationship with the disclosing party; (iv) was developed independently by the receiving party, without any relation to the disclosing party's confidential information; or (v) was disclosed by the receiving party under the terms of an order issued by a competent public authority in a judicial or administrative proceeding.

## 4. Compliance with this Code of Conduct

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It is the responsibility of each of Integration's professionals to ensure full compliance with all the provisions outlined in this Code of Conduct and to seek guidance from their manager or the Risk & Compliance Committee when needed. Moreover, each professional is responsible for making well-founded decisions and ensuring the high standards of integrity fostered by Integration.

### 4.1. Violation report

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All Integration clients, suppliers and business partners have the right and the duty to immediately report any potential violations of the precepts set out in this Code of Conduct to Integration.

Integration has created the IntegrityLine for this very purpose: an exclusive channel for reporting possible misconduct by company professionals while guaranteeing confidentiality and anonymity, the use of which is at the sole discretion of the individual submitting the report. In addition, as Integration prohibits retaliation, due protection is ensured for anyone reporting an occurrence or suspicion of an act in violation of the provisions set out in this Code of Conduct.

Given the nature and importance of this channel, IntegrityLine must be used responsibly by everyone, including those who file

The Risk & Compliance Committee is the body within Integration tasked with ensuring strict compliance with this Code of Conduct. They can be contacted by sending an email to: [riskcommittee@integrationconsulting.com](mailto:riskcommittee@integrationconsulting.com).

complaints. Integration will not tolerate any untruthful reports or those made in bad faith. Such conduct will also be properly investigated and inhibited.

Reports to IntegrityLine can be made via the following channels:

- **Website:** [integrityline.integrationconsulting.com](http://integrityline.integrationconsulting.com), available in Portuguese, English and Spanish.
- **Email:** [integrityline@ethicschannel.com](mailto:integrityline@ethicschannel.com), available in Portuguese, English and Spanish.

Integration and the third party managing this channel treat all registered information in a strictly confidential manner.



## 4.2. Disciplinary measures

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In the event that an action or behavior is found to be in violation of this Code of Conduct, of the company's internal policies or of any applicable laws, Integration reserves the right to impose disciplinary measures on those who have been held responsible for such conduct, be it through action or inaction, once all possible steps have been taken to verify the occurrence in question, including any necessary investigations. Such measures may include, but are not limited to: legal action, termination of employment (with or without cause), termination

of the contractual business relationship (including associates), warnings (verbal or written), suspension etc. Whichever measure is adopted must take into account local laws and the principles of reasonableness and proportionality in accordance with the gravity of the misconduct.

Integration does not tolerate any type of retaliation, whether veiled or not, against anyone who files a report in good faith through the channels made available by Integration.





# Integration

Together, for the change you need

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